

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:)	CASE NO. 17-64952
)	
Nekeisha Emerald Carter,)	CHAPTER 13
)	
Debtor.)	JUDGE BAISIER

MOTION TO SUSPEND PLAN PAYMENTS

COMES NOW Debtor, Nekeisha Emerald Carter, and respectfully requests that her Chapter 13 Plan payments be suspended for 3 months, and shows the Court the following:

1.

On August 28, 2017, Debtor filed a Voluntary Petition for relief in bankruptcy under Title 11, Chapter 13 of the United States Code. Debtor is currently going through confirmations.

2.

Debtor is currently suffering from a disease pulmonary endometreosis. She is currently in a treatment program in Pennsylvania. Pulmonary endometreosis is a disease effecting the uterine cavity. Debtor has already gone through nine surgeries in hopes of being cured. Debtor's doctors have just recently went through a change in their course of treatment.

3.

Debtor asserts that a suspension of her Chapter 13 payment will allow her the opportunity to meet her monthly obligations. She will resume her Chapter 13 Plan payment at the end of the 3 month period with increased payments should the suspension cause the case to exceed sixty (60) months.

4.

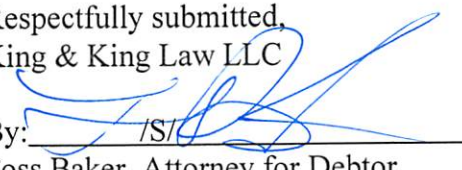
Debtor offers adequate protection to her creditors in that the Chapter 13 Plan payment will be increased, if necessary, to make up for any suspended payments and to comply with the terms of the Bankruptcy Code.

WHEREFORE, Debtor prays:

- a.) That this Motion be granted;
- b.) That Debtor's Chapter 13 Plan payments be suspended for the months of 3; and
- c.) and for such other and further relief as this Court deems equitable and just.

Dated: November 13, 2017

Respectfully submitted,
King & King Law LLC

By:  /s/_____
Foss Baker, Attorney for Debtor
Georgia Bar Number 296402
215 Pryor Street
Atlanta, GA 30303
404-524-6400
notices@kingkingllc.com

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NOTICE OF HEARING

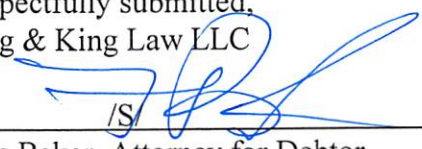
PLEASE TAKE NOTICE that Nekeisha Emerald Carter has filed a Motion to Suspend Plan Payments and related papers with the Court seeking an order suspending Debtor's Chapter 13 Plan payments.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion to Suspend Plan Payments on December 19, 2017 at 10:00 am in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303.

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.). If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, GA 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: November 13, 2017

Respectfully submitted,
King & King Law LLC

By:  /S/ _____
Foss Baker, Attorney for Debtor
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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that I am more than 18 years of age, and that on this day, I served a copy of the within Debtor's Motion to Suspend Plan Payments and Notice of Hearing upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon, unless otherwise stated, to ensure delivery to:

Melissa J. Davey
260 Peachtree Street NW, Suite 200
Atlanta, GA 30303; Via E-notice
Atlanta, GA 30303
Via email: mail@13trusteeatlana.com
Via email: ecf@njwtrustee.com
Via email: courtdailysummary@atlch13tt.com

Nekeisha Emerald Carter
391 Heritage Park Trace NW
Kennesaw, GA 30144

Dated: November 13, 2017

Respectfully submitted,
King & King Law LLC

By: 

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